

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN THE MATTER OF THE SEARCH
OF THE CELLULAR TELEPHONE,
FURTHER DESCRIBED IN
ATTACHMENT A

No. 24 M 493

Hon. Jeffrey Cole
Magistrate Judge

Ref No. 2024 R 00478

**GOVERNMENT’S MOTION TO UNSEAL SEARCH
WARRANT MATERIALS, ORDERS, AND RELATED FILINGS**

The UNITED STATES OF AMERICA, by MORRIS PASQUAL, Acting United States Attorney for the Northern District of Illinois, hereby moves this Court to unseal all items which are under seal in this case, including the Search Warrant, Application, and Affidavit (collectively, the “Search Warrant Materials”), and any orders and related filings. In support of this motion, the government states as follows:

1. On June 18, 2024, the government applied for a Search Warrant in this matter and submitted an Application and Affidavit in support. The Affidavit detailed facts supporting probable cause to believe that evidence and instrumentalities of violations of unlawful possession, transportation, and sale of a firearm, in violation of 18 U.S.C. 922(g)(1), 922(i), and 922(j) would be found in the Subject Device(s).

2. The Court sealed the Search Warrant Materials for a period of 180 days, until December 16, 2024.

3. The Court’s sealing order was based on its finding that the government had demonstrated good cause in support of its motion to seal the items in this case, specifically, that disclosure of such materials would jeopardize the investigation by

providing the subject of the investigation an opportunity to destroy evidence or flee and jeopardize the investigation by disclosing the details of facts known to investigators, the identities of witnesses, and the investigative strategy.

4. The government no longer believes the circumstances which supported sealing the items in this case are applicable.

The government respectfully requests that this Court issue an order unsealing all items that are under seal in this case.

Respectfully submitted,

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